

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

MICHAEL DAILEY, et al.,
Plaintiffs,

v.

BRIDGETON LANDFILL, LLC, et al.,
Defendants.

Case No. 4:22-cv-00116-CDP

BRIDGETON LANDFILL, LLC, et al.,
Third-Party Plaintiff,

v.

UNITED STATES FIDELITY AND
GUARANTY COMPANY, et al.,
Third-Party Defendants.

**PLAINTIFFS' OPPOSITION TO COTTER'S JOINDER
TO EXTEND RESPONSE TIME ON REMAND MOTION (DOC 39)**

It has been more than six years since this suit was first filed in Missouri state court. Discovery-wise all that has been accomplished are the depositions of Robbin and Mike Dailey, Marco Kaltofen, PhD. (one of plaintiffs' experts) and Strongbear, the gentleman who gathers samples for Dr. Kaltofen. There has been a modicum of written discovery as well. The majority of the work, however, has been motion practice concerning which court will see this matter to conclusion. The combined state and federal dockets of this matter contain over 35 pleadings pertaining to removal, remand, and the Price Anderson Act. Cotter's latest removal is not well

founded for the reasons set forth in the Dailey's remand motion. Doc. 32. Cotter set the timetable when it recently removed and so it should be ready to respond in a timely fashion. Plaintiffs object to Cotter's request for additional time to respond to the remand motion.

Respectfully submitted,

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